

**Before the  
Federal Communications Commission**

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In the Matter of	)	
Implementation of a Grant Program	)	
For Remote Community Alert Systems	)	
Pursuant to Section 605(A)	)	Docket PS 07-8
Of the Warning, Alert, and Response	)	
Network (WARN) Act	)	
	)	

**Comments of the Consortium for Citizens for Disabilities  
Task Force on Telecommunications and Technology**

The Consortium for Citizens for Disabilities Task Force on Telecommunications and Technology ("CCDTF") consists of multiple member organizations working in coalition to ensure that telecommunications and technology are accessible to, usable by and available to the widest number of persons with disabilities. The members of this Coalition,<sup>1</sup> who support the comments below are: the American Association of People with Disabilities (AAPD), American Council of the Blind (ACB), American Foundation for the Blind (AFB), Association of Assistive Technology Act Programs (ATAP), and Easter Seals. CCDTF is pleased to comment in this docket due to the pressing need for emergency information to be available to the widest number of persons, including persons with disabilities.

In the Public Notice, FCC 07-4, released January 23, 2007, the Commission seeks comment on how it shall establish a program under which grants may be made to provide for outdoor alerting technologies in remote communities effectively unserved by commercial mobile service for the purpose of enabling residents of those communities to receive emergency alerts. By this Public Notice, the Commission asks how it should interpret "remote communities effectively unserved by commercial mobile service," as required under Section 605(a) of the WARN Act.

For purposes of the grant program, and in general, the CCDTF supports interpreting broadly the meaning of "remote communities effectively unserved by commercial mobile service." The Commission asks for comment on three specific questions that we address below. We also offer some additional recommendations about the administration of the grant program.

**1. "Remote Communities."**

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<sup>1</sup>A description of each member organization of the Consortium Task Force supporting these Comments appears in Appendix II.

As a practical guide, the Commission has previously defined "rural area" as "those counties (or equivalent) with a population density of 100 persons per square mile or less, based upon the most recently available Census data." CCDTF believes that this definition is too limiting and could serve to eliminate some beneficiaries of the grant program as it is too narrow in scope.

According to the U.S. Department of Education, which funds a Research and Training Center on Disability in Rural Communities (RRTC), they assert there are over 12.5 million Americans with disabilities in rural areas.<sup>2</sup>

Specifically, there are 886 counties with the number of persons with disabilities between 22 and 2,499 persons. And there are 1,367 counties with the number of persons with disabilities ranging from 2,500 to 9,999. For further details please see the Map in Appendix I attached that illustrates the number of people with disabilities, age over 5 years, in the civilian non-institutionalized population by county in the U.S. (also available at <http://rtc.ruralinstitute.umt.edu/geography/pdf/Disability%20Map.pdf>)

We caution also that "remote communities" defined as those with a population density of 100 persons per square mile or less may otherwise cause the program to miss serving households and groups of persons, or persons living alone, with disabilities who due to their disability, may in fact live remote lives but in higher density areas. That is, such persons and households may not easily have access to electronic communication in their neighborhood or community or to public safety responders.

Therefore, under the WARN Act, we do not believe the proposed definition – population density of 100 persons per square mile or less – meets the purposes of administering the grant program envisioned by Congress under Section 605(a) and we urge a wider scope.

## **2. "Commercial Mobile Service."**

CCDTF offers no comment in regard to the appropriate definition of "Commercial Mobile Service" and the differences between Section 602(b)(1)(A) of the WARN Act and the definition of "commercial mobile service" in Section 332(d)(1) of the Communications Act.

However, for persons with disabilities, accessibility and usability, and availability of wireless and wireline services is paramount in an age when natural and manmade disasters can occur and there is a need to communicate. More specifically, we are concerned with interoperability of devices so that persons with all kinds of disabilities can have access to and understand emergency alert systems. We would therefore expect emergency alert systems to reflect the accessibility and usability requirements under Section 255 of the Communications

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<sup>2</sup> RRTC on Disability web site at <http://rtc.ruralinstitute.umt.edu/>, last accessed February 22, 2007.

Act<sup>3</sup> for end user technologies and in light of interoperability. Specifically, installation of technologies in remote communities should enable residents to receive emergency alerts no matter what the physical attributes are of the end users.

For instance, persons who are deaf and hard of hearing and who may rely almost completely on text forms of communication, need to have access to and use of text-based systems of communication that cross different “pipelines” used to transmit information (i.e., regardless of cable used or wire substance or spectrum used).

Likewise, persons with vision disabilities may rely almost completely on audio outputs and need to have access to and use of systems of communication that permit an audio output.

Similarly, we are concerned about products and services that are “too complicated” to use and urge development of emergency alert systems with end user devices that are simple to activate and use and that do not require extensive training, do not require use of third party cueing or coaching and which share characteristics of products and services that people are generally familiar with.

### **3. "Effectively Unserved."**

CCDTF supports the Commission belief that the phrase "effectively unserved" modifies the phrase "remote communities," and that the intent of this language is to identify those remote communities that would not be able to receive emergency warning alerts from commercial mobile service providers who voluntarily elect to transmit emergency alerts.

From our viewpoint, "effectively unserved" means that the current means of communication is not accessible to, usable by or available to a person with a disability.

We encourage the program to use a wide variety of means, such as coverage maps from service providers, technical analyses, field tests, and subscriber levels or other available information to determine scope of unserved. For instance, for persons with hearing disabilities whose primary language is American Sign Language, lack of a broadband connection can mean they do not have access to the Video Relay form of Telecommunications Relay Service and thus they cannot communicate with first responders in their native language. Therefore, information from relay services providers may be useful in aggregating the unserved.

### **4. Additional recommendations about the grant program.**

For purposes of the grant program, CCDTF recommends that entities who seek grants in this program are required to work with state and local entities that serve people with

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<sup>3</sup> 47 CFR, Parts 6 and 7.

disabilities so that they can more fully address the technological means by which people with disabilities in a particular area receive emergency alerts.

For instance, to ensure that emergency alert systems meet the needs of deaf and hard of hearing persons, grant-receiving entities should be required to work with local and state public and nonprofit organizations serving people with hearing disabilities. Likewise, such entities should work directly with entities that serve the needs of persons with vision disabilities, so that the technological needs of persons with vision disabilities are properly addressed. Additionally, since the populations of persons with cognitive and intellectual disabilities are often never considered, there should be a requirement to address these needs. Furthermore, entities that represent or serve the needs of persons with mental illness should be contacted in any program of activities, to ensure that the needs of persons with these types of disabilities are considered.

Thank you for the opportunity to comment on this program. We apologize for the delay in filing our comments and ask for your consideration and understanding with this.

The Consortium for Citizens for Disabilities Task Force on Telecommunications and Technology

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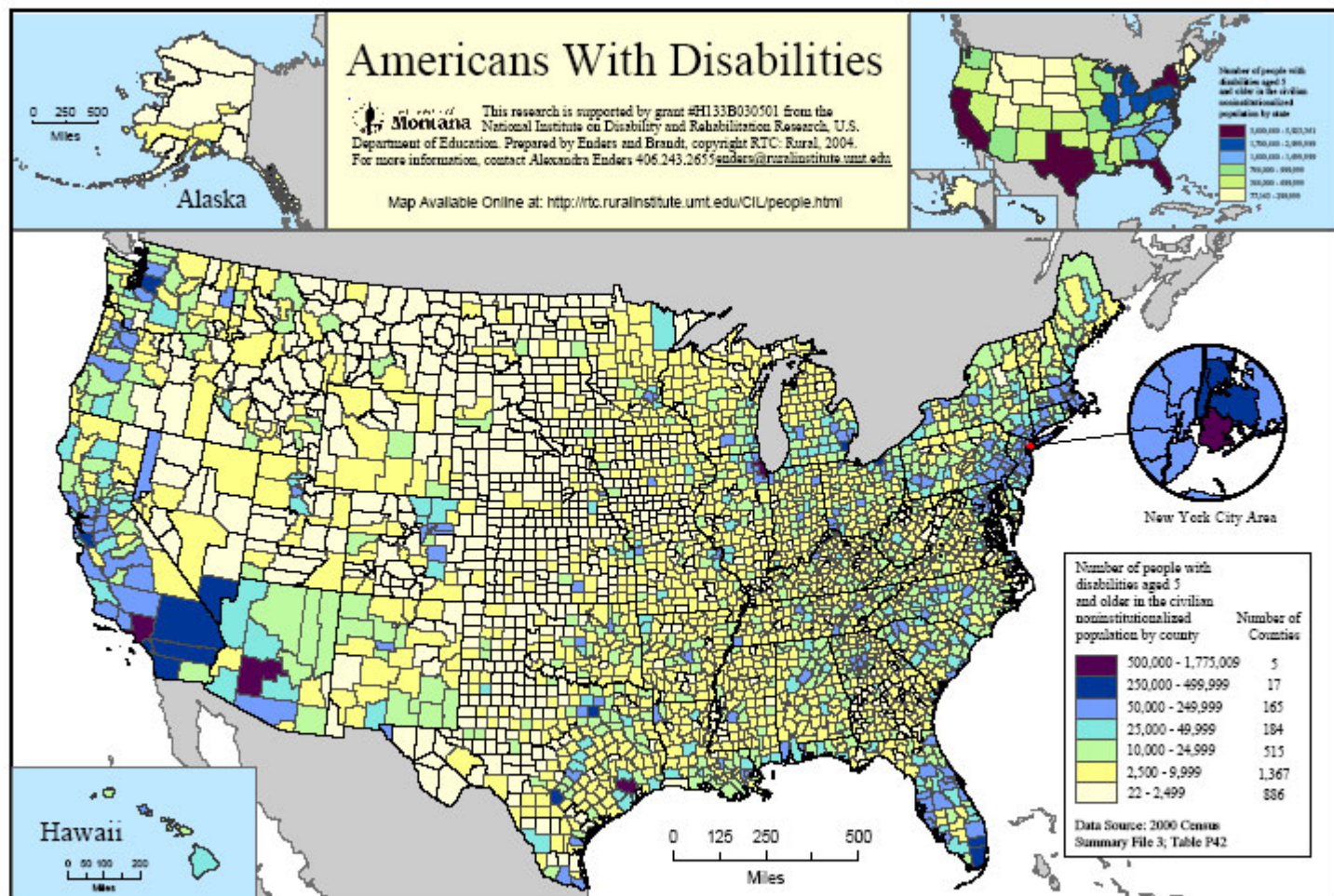
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Other CCDTF Members include (but not available for timely sign on to these Comments):  
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Developmental Disabilities (AAIDD), the American Speech-Language-Hearing Association  
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(UCP), The ARC, NISH ( previously, National Industries for the Severely Handicapped) and  
TASH.(previously, The Association for the Severely Handicapped).

## APPENDIX I

Map showing number of people with disabilities, age over 5 years, in the civilian non-institutionalized population by county in the U.S.

See at <http://rtc.ruralinstitute.umt.edu/geography/pdf/Disability%20Map.pdf>, last accessed February 22, 2007





## APPENDIX II

### **Members of the Consortium for Citizens for Disabilities Task Force on Telecommunications and Technology (“CCDTF”)**

**AAPD.** The American Association of People with Disabilities is the largest national nonprofit cross-disability member organization in the U.S., dedicated to ensuring economic self-sufficiency and political empowerment for the more than 51 million Americans with disabilities. AAPD works in coalition with other disability organizations for the full implementation and enforcement of disability nondiscrimination laws, particularly the Americans with Disabilities Act of 1990 and the Rehabilitation Act of 1973, as well as other statutes, such as the disability accessibility mandates in the Communications Act.

**ACB.** The American Council of the Blind (ACB) is one of the leading national organizations of people who are blind and visually impaired. Consisting of tens of thousands of members and more than seventy affiliates across the United States, ACB is dedicated to improving the quality of life, equality of opportunity and independence of all people who have visual impairments.

**AFB.** The American Foundation for the Blind is a national nonprofit that expands possibilities for people with vision loss. AFB's priorities include broadening access to technology; elevating the quality of information and tools for the professionals who serve people with vision loss; and promoting independent and healthy living for people with vision loss by providing them and their families with relevant and timely resources. AFB is also proud to house the Helen Keller Archives and honor the over forty years that Helen Keller worked tirelessly with AFB. For more information visit <http://www.afb.org>.

**ATAP.** The Association of Assistive Technology Act Programs is a national, member-based organization, comprised of state Assistive Technology Act Programs funded under the Assistive Technology Act (“AT Act”). The mission of ATAP is to promote the collaboration of AT Programs with persons with disabilities, providers, industry, advocates and others at the state and national level and to increase the availability and utilization of accessible information technology (IT) and assistive technology devices and services (AT) for all individuals with disabilities in the United States and territories.

**Easter Seals.** Easter Seals has been helping individuals with disabilities and special needs, and their families, live better lives for more than 80 years. From child development centers to physical rehabilitation and job training for people with disabilities, Easter Seals offers a variety of services to help people with disabilities address life's challenges and achieve personal goals. Easter Seals assists more than one million children and adults with disabilities and their families annually through a nationwide network of more than 450 service sites. Each center provides top-quality, family-focused and innovative services tailored to meet the specific needs of the particular community it serves.

